

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DR. JASMINE YOUNGE,

Plaintiff,

v.

FULTON JUDICIAL CIRCUIT
DISTRICT ATTORNEY'S
OFFICE, GEORGIA

Defendant.

Civil Action No.

1:20-cv-00684-WMR

JURY TRIAL DEMANDED

**CONSENT MOTION TO EXTEND TIME TO RESPOND TO
MAGISTRATE JUDGE'S REPORT AND RECOMMENDATION**

Plaintiff Dr. Jasmine Younge ("Plaintiff"), by and through her undersigned counsel, hereby moves for this Court to extend the deadline by which the parties have to respond to the Magistrate Judge's Final Report and Recommendation by two weeks, or through January 9, 2023. In support of this Motion, Plaintiff respectfully states as follows:

1. Plaintiff filed her Complaint with the United States District Court for the Northern District of Georgia on February 13, 2020, [Doc. 1]; she amended her complaint on August 10, 2020. [Doc. 31].

2. On March 24, 2021, Defendant filed its Answer to Plaintiff's Amended Complaint. [Doc. 53].

3. Defendant filed its initial Motion for Summary Judgment on April 8, 2022, and filed its Motion for Summary Judgment May 16, 2022. [Docs. 96, 104].

4. The Parties subsequently filed their respective responses and replies, and a hearing on the pending Motion for Summary Judgment was held before Magistrate Judge Catherine Salinas on December 9, 2022. [Doc. 127].

5. On December 12, 2022, Magistrate Judge Catherine M. Salinas issued her Final Report and Recommendation, [Doc. 128], granting Defendant's Motion for Summary Judgment in full.

6. Responses to the Report and Recommendation are currently due on December 26, 2022.

7. Due to previously existing Court deadlines and case commitments, as well as the upcoming winter holidays, Plaintiff respectfully moves the Court for an additional two weeks, through and including January 9, 2023, for the parties to file their respective responses to the Magistrate Judge's Report and Recommendation.

8. Counsel for Defendant has been consulted and consents to the requested extension.

9. A proposed Order granting the requested extension of time to respond is submitted with this Motion for the Court's convenience.

Respectfully submitted this 20th day of December, 2022.

BARRETT & FARAHANY

s/ Matthew C. Billips

Matthew C. Billips

Georgia Bar No. 057110

Attorney for Jasmine Younge

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CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed the foregoing *Consent Motion to Extend Time to Respond to the Magistrate Judge's Report and Recommendation* with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the attorneys of record.

Respectfully submitted this 20th day of December, 2022.

BARRETT & FARAHANY

s/ Matthew C. Billips

Matthew C. Billips

Georgia Bar No. 057110

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ORDER

The above-styled case is presently before the Court on the parties' *Consent Motion to Extend Time to Respond to the Magistrate Judge's Report and Recommendation*. After careful consideration and for good cause shown, the Consent Motion is **GRANTED**. The parties shall have up to and including January 9, 2023, to file their respective responses to the Magistrate Judge's Report & Recommendation.

SO ORDERED this ____ day of December, 2022.

THE HONORABLE WILLIAM M. RAY, II
DISTRICT COURT JUDGE